

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MARK GEINOSKY,	)	
	)	
Plaintiff,	)	No. 10 C 1438
	)	
vs.	)	Judge Darrah
	)	Magistrate Judge Valdez
CITY OF CHICAGO, et al.,	)	
	)	
Defendants.	)	

**AGREED MOTION FOR ATTORNEYS' FEES**

Plaintiff Mark Geinosky, through counsel, Jackowiak Law Offices, respectfully requests that this Honorable Court enter the attached agreed order of attorneys' fees. In support thereof, Plaintiff states as follows:

1. This motion is agreed.
2. Pursuant to an agreement of the parties, the individual Defendant-Officers have been dismissed with prejudice.
3. Plaintiff has accepted and filed an offer of judgment from the City of Chicago in the amount of \$85,000.00.
4. Defendant City of Chicago has agreed to the entry of an order for reasonable attorney fees under 42 U.S.C. § 1988 in the amount of \$80,000.00.
5. City of Chicago will satisfy the judgment in favor of Plaintiff for \$85,000.00 for damages, and \$80,000.00 for attorney fees.

Respectfully submitted,

/s/ Lawrence Jackowiak  
*Counsel for Plaintiff*

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